

Dennis M. Reznick (DR4841)  
EDWARDS ANGELL PALMER & DODGE LLP  
51 John F. Kennedy Parkway  
Short Hills, NJ 07078  
(973) 376-7700

Of Counsel:  
Bart Murphy, Esq.  
Jim L. Peterson, Esq.  
Judy S. Okenfuss, Esq.  
ICE MILLER LLP  
One American Square  
Suite 3100  
Indianapolis, IN 46282-0200  
*Attorney for Defendants RC2 Corporation, Learning  
Curve Brands, Inc., and Toys "R" Us, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

DAVID MURDOCK, Individually and as )  
Father and Next Friend of BEAU FARISH )  
MURDOCK and ANABELLE SAGE )  
MURDOCK, minor children, on behalf of )  
all others similarly situated, )

Plaintiffs, )

v. )

RC2 CORPORATION, LEARNING )  
CURVE BRANDS, INC., LEARNING )  
CURVE BRANDS, INC. d/b/a RC2 )  
BRANDS, INC., WAL-MART STORES, )  
INC. and TOYS "R" US, INC., )

Defendants. )

Civil Action No. 2:07-CV-03376 (WHW-MF)

**DEFENDANTS RC2 CORPORATION,  
LEARNING CURVE BRANDS, INC., AND  
TOYS "R" US, INC.'S NOTICE OF CROSS-  
MOTION FOR STAY OF PROCEEDINGS  
AND FOR EXTENSION OF TIME TO  
ANSWER**

**ORAL ARGUMENT REQUESTED**

**[Document Electronically Filed]**

TO: Peter S. Pearlman, Esq.  
COHN LIFLAND PEARLMAN  
HERRMANN & KNOPF LLP  
Park 80 Plaza West-One  
Saddle Brook, NJ 07663  
*Attorneys for Plaintiff*

Jack Reise, Esq.  
Stuart A. Davidson, Esq.  
James L. Davidson, Esq.  
COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
120 E. Palmetto Park Road, Suite 500  
Boca Raton, FL 33432-4809  
*Attorneys for Plaintiff*

Richard D. Millett, Esq.  
RICHARD D. MILLETT &  
ASSOCIATES LLC  
1065 Route 22 West, Suite 1A  
Bridgewater, NJ 08807  
*Attorneys for Defendant Wal-Mart  
Stores, Inc.*

PLEASE TAKE NOTICE that on Monday, September 24, 2007 at 10:00 a.m., or as soon thereafter as counsel may be heard, Edwards Angell Palmer & Dodge LLP, attorneys for defendants RC2 Corporation, Learning Curve Brands, Inc. and Toys "R" Us, Inc. (collectively referred to as the "Moving Defendants"), shall cross-move before the Hon. William H. Walls, U.S.D.J., at the United States District Court for the District of New Jersey, M.L. King Jr. Federal Building and Courthouse, 50 Walnut Street, Newark, NJ 07102, pursuant to Local Civil Rules 6.1 and 7.1, for an Order (i) staying proceedings in this action pending a ruling of the Judicial Panel on Multidistrict Litigation ("JPML") on the Moving Defendant's Motion for Transfer of Actions to the Northern District of Illinois for Coordinated Pre-Trial Proceedings Pursuant to 28 U.S.C. § 1407 ("Motion for Transfer"), and on the two other motions pending before the JPML relating to this action, and (ii) extending the time in which Moving Defendants have to answer, move or otherwise respond to Plaintiff's Class Action Complaint to thirty (30) days after a ruling of the JPML on the Moving Defendants' Motion for Transfer and on the two other motions pending before the JPML relating to this action.

PLEASE TAKE FURTHER NOTICE that Moving Defendants shall rely upon the Certification of Dennis M. Reznick, Esq., with exhibits annexed thereto, the Certification of Judy S. Okenfuss, Esq., with exhibit annexed thereto, and Moving Defendants' Memorandum of Law in Opposition to Plaintiff's Motion for Appointment of Interim Lead Counsel and in Support of Motion for Stay of Proceedings and for Extension of Time to Answer, filed herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is also filed herewith.

Respectfully submitted,

EDWARDS ANGELL PALMER  
& DODGE LLP

By: 

Dennis M. Reznick (DR4841)

51 John F. Kennedy Parkway  
Short Hills, NJ 07078  
(973) 376-7700

Of Counsel:

Bart Murphy, Esq.

Jim L. Peterson, Esq.

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One American Square, Suite 3100

Indianapolis, IN 46282-0200

Attorneys for Defendants RC2 Corporation,  
Learning Curve Brands, Inc. and Toys "R"  
Us, Inc.

**CERTIFICATION OF SERVICE**

I hereby certify that on September 10, 2007, a true copy of the within Notice of Cross-Motion for Stay of Proceedings and for Extension of Time to Answer was served pursuant to the Federal Rules of Civil Procedure, and/or the District of New Jersey's Local Rules and/or the District of New Jersey's ECF Policies and Procedures and by sending same via first class mail service offered by the U.S. Postal Service, in postage paid envelopes addressed to the following counsel for the parties at the addresses indicated:

Peter S. Pearlman, Esq.  
COHN LIFLAND PEARLMAN  
HERRMANN & KNOPF LLP  
Park 80 Plaza West-One  
Saddle Brook, NJ 07663

*Attorneys for Plaintiff*

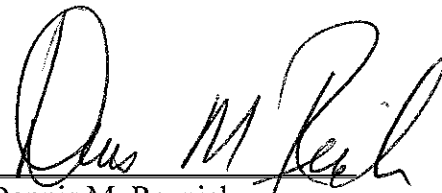
Jack Reise, Esq.  
Stuart A. Davidson, Esq.  
James L. Davidson, Esq.  
COUGHLIN STOIA GELLER RUDMAN &  
ROBBINS LLP  
120 E. Palmetto Park Road, Suite 500  
Boca Raton, FL 33432-4809

*Attorneys for Plaintiff*

Richard D. Millett, Esq.  
RICHARD D. MILLETT & ASSOCIATES  
LLC  
1065 Route 22 West, Suite 1A  
Bridgewater, NJ 08807

*Attorneys for Defendant Wal-Mart Stores, Inc.*

Executed on: September 10, 2007

  
Dennis M. Reznick